



23490 Connecticut Street
Hayward, California 94545
510.773-9137-510.782-8584 Fax

August 26, 2004

COPY

Mr. William J. Gaffney
NAPA SANITATION DISTRICT
935 Hartle Court
Napa, CA 94559

Re: July 2004 Compliance Monitoring Results for the Jefferson Car Wash Site Groundwater Extraction and Treatment System, 3080 Jefferson Street, Napa, California, Industrial User Permit No. 495950.

Dear Mr. Gaffney:

This letter presents the results of July 2004 Compliance Monitoring for the Groundwater Extraction and Treatment System (System) at the Jefferson Car Wash site, 3080 Jefferson Street, Napa, California. Compliance monitoring and reporting have been conducted in accordance with the guidelines stipulated in the Industrial User Permit No. 495950. Presented herein are the results of the 4th compliance monitoring event after System start-up, which occurred on March 29, 2004.

The compliance monitoring activities for this reporting period were performed by Decon Environmental Services, the operations and maintenance (O&M) contractor for the System, under the direction of Malcolm Pirnie on August 6, 2004. The monitoring activities included:

1. Sampling the System effluent.
2. Recording the total volume of raw water discharged from individual extraction wells (EW-2 and EW-3).
3. Recording the total volume of treated water discharged to sanitary sewer.

Per Permit requirements, effluent samples were analyzed for total petroleum hydrocarbons as diesel (TPH-D) by United States Environmental Protection Agency (USEPA) Method 8015M, TPH as gasoline (TPH-G), benzene, toluene, ethylene, total xylenes (BTEX), and methyl-tertiary-butyl ether (MTBE) by USEPA Method 8260B, and total lead by USEPA Method 200.7.

Mr. William J. Gaffney
NAPA SANITATION DISTRICT

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Table 1 presents the analytical results for the System effluent and the System flow parameters. The analytical laboratory report is attached.

The analytical laboratory reported the concentrations of constituents of concern to be non-detect in the System effluent. The average daily discharge rate for this reporting period was estimated to be 5.0 gallons per minute (gpm), which was below the 8 gpm limit. A total of 209,250 gallons of treated water was discharged to the sanitary sewer during this reporting period.

Please contact Jason at (510) 732-6444 Ext. 17 or Todd Miller with Malcolm Pirnie at (510) 735-3014 to discuss any comments or questions.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that a qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Sincerely,

DECON ENVIRONMENTAL SERVICES



Jason Gulbransen
Project Manager

Attachments: Table 1, Analytical Laboratory Report

c: George Altamura, Altamura Enterprises
Joel Coffman, Napa County

Mr. William J. Gaffney
NAPA SANITATION DISTRICT

August 26, 2004
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Todd Miller, Malcolm Pirnie
File (4459-008)

P:\4459\008\GWTS Compliance Monitoring\July 2004 Compliance Monitoring Letter Report.doc

Table 1: Compliance Monitoring Results, July 2004
Interim Groundwater Extraction and Treatment System
Jefferson Car Wash Site
Industrial User Permit No: 495950

Parameter	Units	USEPA Method	Date Collected	System Effluent	Permitted Reporting Limit ¹
Volatile Organic Compounds					
Methyl Tertiary-Butyl Ether	µg/L ⁶	8260B	8/6/2004	< 1	1.0% LEL ⁴
Benzene	µg/L	8260B	8/6/2004	< 0.5	1.0% LEL
Toluene	µg/L	8260B	8/6/2004	< 0.5	1.0% LEL
Ethylbenzene	µg/L	8260B	8/6/2004	< 0.5	1.0% LEL
Xylenes, Total	µg/L	8260B	8/6/2004	< 1	1.0% LEL
TPH as Gasoline	µg/L	8260B	8/6/2004	< 25	-- ⁵
TPH as Diesel	µg/L	8015M	8/6/2004	< 57	--
Total Lead	mg/L ⁷	200.7	8/6/2004	< 0.015	0.14
Operational					
Total Volume Discharged to Sanitary Sewer ²	gallons	--	8/6/2004	209,250	--
Daily Average System Flow Rate ³	gpm ⁸	--	8/6/2004	5.0	8

Notes:

¹ As stated in Industrial User Permit, No: 495950, issued for the System on 03/02/2004.

² The sum of volumes extracted from individual wells, EW-2 and EW-3, for this period as recorded by the flow totalizer at the respective well-head.

i.e., { Sum of Flow Totalizer Volume at EW-2 and EW-3 for this period } -
{ Sum of Flow Totalizer Volume at EW-2 and EW-3 for the previous period }

³ Calculated as the Total Volume Discharged to Sanitary Sewer divided by the number of days the system was in operation during the reporting period (29 days for this period).

⁴ Lower explosive limit.

⁵ No reporting limit stated or not applicable.

⁶ Micrograms per liter.

⁷ Milligrams per liter.

⁸ Gallons per minute.

Entech Analytical Labs, Inc.

3334 Victor Court • Santa Clara, CA 95054 • (408) 588-0200 • Fax (408) 588-0201

Jason Gulbransen

Certificate ID: 39957 - 8/20/2004 12:42:04 PM

Decon Environmental Services, Inc.

23490 Connecticut Street

Hayward, CA 94545

Order: 39957

Date Collected: 8/6/2004

Project Name: Jefferson Carwash

Date Received: 8/6/2004

Project Number: 4470

P.O. Number: 4470

Certificate of Analysis - Final Report

On August 06, 2004, sample was received under chain of custody for analysis. Entech analyzes samples "as received" unless otherwise noted. The following results are included:

<u>Matrix</u>	<u>Test</u>	<u>Method</u>	<u>Comments</u>
Liquid	8260Petroleum	EPA 8260B	
	Lead	EPA 200.7	
	PDF	PDF	
	TPH as Gasoline - GC/MS	GC-MS	
	TPH-Extractable	EPA 8015 MOD. (Extractable)	

Entech Analytical Labs, Inc. is certified for environmental analyses by the State of California (#2346).
If you have any questions regarding this report, please call me at 408-588-0200.

Sincerely,


Laurie Glantz-Murphy
Laboratory Director

Entech Analytical Labs, Inc.

3334 Victor Court , Santa Clara, CA 95054

Phone: (408) 588-0200

Fax: (408) 588-0201

Decon Environmental Services, Inc.
23490 Connecticut Street
Hayward, CA 94545
Attn: Jason Gulbransen

Date: 8/20/2004
Date Received: 8/6/2004
Project Name: Jefferson Carwash
Project Number: 4470
P.O. Number: 4470
Sampled By: Client

Certified Analytical Report

Lab # : 39957-001 Sample ID: Discharge

Matrix: Liquid Sample Date: 8/6/2004 7:15 AM

Method: EPA 200.7 / EPA 3010B / Acid Digestion for ICP for 6010B

Parameter	Result	Flag	DF	PQL	PQLR	Units	Prep Date	Prep Batch	Analysis Date	QC Batch
Lead	ND		1	0.015	0.015	mg/L	08/10/2004	WM040810	08/11/2004	WICP2040811-3

Analyzed by: Mfelix
Reviewed by: DQUEJA

TPH as Diesel	ND		1	57	57	µg/L	08/09/2004	DW4792A	08/10/2004	DW4792A
Comment:										

Surrogate	Surrogate Recovery	Control Limits (%)
o-Terphenyl	62.0	16 - 137

Analyzed by: MTran
Reviewed by: MTU

*** Reporting limit increased due to limited sample volume.

Benzene	ND		1	0.5	0.5	µg/L	N/A	N/A	08/18/2004	WMS1040818B
Toluene	ND		1	0.5	0.5	µg/L	N/A	N/A	08/18/2004	WMS1040818B
Ethyl Benzene	ND		1	0.5	0.5	µg/L	N/A	N/A	08/18/2004	WMS1040818B
Xylenes, Total	ND		1	1	1	µg/L	N/A	N/A	08/18/2004	WMS1040818B
Methyl-t-butyl Ether	ND		1	1	1	µg/L	N/A	N/A	08/18/2004	WMS1040818B

Surrogate	Surrogate Recovery	Control Limits (%)
4-Bromofluorobenzene	90.4	64 - 125
Dibromofluoromethane	108.0	23 - 172
Toluene-d8	99.5	70 - 134

Analyzed by: Xbian
Reviewed by: MTU

TPH as Gasoline	ND		1	25	25	µg/L	N/A	N/A	08/18/2004	WMS1040818B
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Surrogate	Surrogate Recovery	Control Limits (%)
4-Bromofluorobenzene	107.0	64 - 125
Dibromofluoromethane	102.0	23 - 172
Toluene-d8	107.0	70 - 134

Analyzed by: Xbian
Reviewed by: MTU

Entech Analytical Labs, Inc.

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Quality Control - Method Blank

Prep Batch ID: WM040810

Validated by: DQUEJA - 08/20/04

QC Batch ID: WICP2040811-3

Matrix: Liquid

Prep Date: 8/10/2004

Date of Analysis: 8/11/2004

Method: EPA 200.7

Parameter	Result	DF	PQL	PQLR	Units
Lead	ND	1	0.015	0.015	mg/L

Quality Control - Laboratory Control Spike / Duplicate Results

Prep Batch ID: WM040810

QC Batch ID: WICP2040811-3

Prep Date: 8/10/2004

Date of Analysis: 8/11/2004

Method EPA 200.7

Liquid

Conc. Units: mg/L

Parameter	Blank	Spike Amt	SpikeResult	QC Type	Analysis Date	% Recovery	RPD	RPD Limits	Recovery Limits
Lead	<0.015	0.5	0.4885	LCS	8/11/2004	97.7			90 - 126
Lead	<0.015	0.5	0.505	LCSD	8/11/2004	101.0	3.3	25	90 - 126

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Quality Control - Method Blank

Prep Batch ID: DW4792A

Validated by: MTU - 08/11/04

QC Batch ID: DW4792A

Prep Date: 8/9/2004

Matrix: Liquid

Date of Analysis: 8/10/2004

Method: EPA 8015 MOD. (Extractable)

Parameter	Result	DF	PQL	PQLR	Units
TPH as Diesel	ND	1	57	57	µg/L

Surrogate for Blank	% Recovery	Control Limits
o-Terphenyl	91.0	16 - 137

Quality Control - Laboratory Control Spike / Duplicate Results

Prep Batch ID: DW4792A

Reviewed by: MTU - 08/11/04

QC Batch ID: DW4792A

Prep Date: 8/9/2004

Date of Analysis: 8/10/2004

Method EPA 8015 MOD. (Extractable)

Liquid

Conc. Units: µg/L

Parameter	Blank	Spike Amt	SpikeResult	QC Type	Analysis Date	% Recovery	RPD	RPD Limits	Recovery Limits
TPH as Diesel	<50	1000.0	917.	LCS	8/10/2004	91.7			38 - 135
TPH as Motor Oil	<250	500.0	556.	LCS	8/10/2004	111.2			38 - 135

Surrogate	% Recovery	Control Limits
o-Terphenyl	93.0	16 - 137

TPH as Diesel	<50	1000.0	738.	LCSD	8/10/2004	73.8	21.6	25	38 - 135
TPH as Motor Oil	<250	500.0	473.	LCSD	8/10/2004	94.6	16.1	25	38 - 135

Surrogate	% Recovery	Control Limits
o-Terphenyl	82.0	16 - 137

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Quality Control - Method Blank

QC Batch ID: WMS1040818B

Validated by: MTU - 08/19/04

Matrix: Liquid

Date of Analysis: 8/18/2004

Method: EPA 8260B

Parameter	Result	DF	PQL	PQLR	Units
Benzene	ND	1	0.5	0.5	µg/L
Ethyl Benzene	ND	1	0.5	0.5	µg/L
Methyl-t-butyl Ether	ND	1	1	1	µg/L
Toluene	ND	1	0.5	0.5	µg/L
Xylene, m+p	ND	1	1	1	µg/L
Xylene, o	ND	1	0.5	0.5	µg/L
Xylenes, Total	ND	1	1	1	µg/L

Surrogate for Blank	% Recovery	Control Limits
4-Bromofluorobenzene	91.7	64 - 125
Dibromofluoromethane	101.0	23 - 172
Toluene-d8	100.0	70 - 134

Quality Control - Laboratory Control Spike / Duplicate Results

Reviewed by: MTU - 08/19/04

QC Batch ID: WMS1040818B

Date of Analysis: 8/18/2004

Method EPA 8260B

Parameter				Liquid	Conc. Units: µg/L				
	Blank	Spike Amt	SpikeResult	QC Type	Analysis Date	% Recovery	RPD	RPD Limits	Recovery Limits
1,1-Dichloroethene	<0.5	20.0	19.4	LCS	8/18/2004	97.0			60 - 132
Benzene	<0.5	20.0	22.2	LCS	8/18/2004	111.0			77 - 154
Chlorobenzene	<0.5	20.0	21.2	LCS	8/18/2004	106.0			66 - 141
Methyl-t-butyl Ether	<1	20.0	19.4	LCS	8/18/2004	97.0			58 - 127
Toluene	<0.5	20.0	19.9	LCS	8/18/2004	99.5			47 - 137
Trichloroethene	<0.5	20.0	20.9	LCS	8/18/2004	104.5			57 - 159

Surrogate	% Recovery	Control Limits
4-Bromofluorobenzene	91.8	64 - 125
Dibromofluoromethane	99.8	23 - 172
Toluene-d8	92.5	70 - 134

1,1-Dichloroethene	<0.5	20.0	18.8	LCSD	8/18/2004	94.0	3.1	25	60 - 132
Benzene	<0.5	20.0	21.5	LCSD	8/18/2004	107.5	3.2	25	77 - 154
Chlorobenzene	<0.5	20.0	20.8	LCSD	8/18/2004	104.0	1.9	25	66 - 141
Methyl-t-butyl Ether	<1	20.0	19.7	LCSD	8/18/2004	98.5	1.5	25	58 - 127
Toluene	<0.5	20.0	19.6	LCSD	8/18/2004	98.0	1.5	25	47 - 137
Trichloroethene	<0.5	20.0	20.5	LCSD	8/18/2004	102.5	1.9	25	57 - 159

Surrogate	% Recovery	Control Limits
4-Bromofluorobenzene	90.1	64 - 125
Dibromofluoromethane	99.2	23 - 172
Toluene-d8	93.0	70 - 134

Entech Analytical Labs, Inc.

3334 Victor Court , Santa Clara, CA 95054

Phone: (408) 588-0200

Fax: (408) 588-0201

Quality Control - Method Blank

QC Batch ID: WMS1040818B

Validated by: MTU - 08/19/04

Matrix: Liquid

Date of Analysis: 8/18/2004

Method: GC-MS

Parameter	Result	DF	PQL	PQLR	Units
TPH as Gasoline	ND	1	25	25	µg/L

Surrogate for Blank	% Recovery	Control Limits
4-Bromofluorobenzene	108.0	64 - 125
Dibromofluoromethane	95.1	23 - 172
Toluene-d8	108.0	70 - 134

Quality Control - Laboratory Control Spike / Duplicate Results

Reviewed by: MTU - 08/19/04

QC Batch ID: WMS1040818B

Date of Analysis: 8/18/2004

Method GC-MS

Liquid

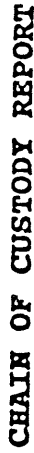
Conc. Units: µg/L

Parameter	Blank	Spike Amt	SpikeResult	QC Type	Analysis Date	% Recovery	RPD	RPD Limits	Recovery Limits
TPH as Gasoline	<25	125.0	145.3	LCS	8/18/2004	116.2			65 - 135

Surrogate	% Recovery	Control Limits
4-Bromofluorobenzene	109.0	64 - 125
Dibromofluoromethane	93.6	23 - 172
Toluene-d8	108.0	70 - 134

TPH as Gasoline	<25	125.0	140.2	LCSD	8/18/2004	112.2	3.6	25	65 - 135
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Surrogate	% Recovery	Control Limits
4-Bromofluorobenzene	110.0	64 - 125
Dibromofluoromethane	92.9	23 - 172
Toluene-d8	108.0	70 - 134



CHAIN OF CUSTODY REPORT

* G = Grab C = Composite W = Wipe